

Lauri Valjakka (Pro Se)
Arinakatu 2 B38
FI 53100 Lappeenranta
Finland
+358 50 467 0090
lauri.valjakka@eezykeyz.fi

Filed on behalf of Pro Se
LAURI VALJAKKA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

DECLARATION OF LAURI VALJAKKA

1 I, Lauri Valjakka, declare as follows:

- 2 1. I am a citizen of the Republic of Finland and the original inventor of the technology underlying
3 U.S. Patent No. 8,495,167.
- 4 2. I filed the first patent application for the invention on August 2, 2001 through my company, e-3
5 Solutions Oy, with the European Patent Office (EPO). Mr. Iiro Karesniemi joined the company
6 on January 3, 2002 and was first informed of the patent application in February 2002.
- 7 3. I am representing myself in this matter as a Pro Se plaintiff. I have independently managed all
8 filings, procedural steps, and factual documentation, including the petition to revive the patent in
9 the United States (Exhibit 6).
- 10 4. I have participated in Finnish legal proceedings, including the Supreme Court of Finland's ruling
11 in August 2025 (Exhibit 9).
- 12 5. I have maintained financial transparency through CDN Licensing Finland Oy, which received
13 third-party funding and documented licensing income (Exhibits 4–D).
- 14 6. I respectfully request that the Court deny Defendant's motion for summary judgment.

15 Executed on September 15, 2025.

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17 7. Exhibit 9 to my declaration is a true and correct copy of a Microsoft Copilot AI translation of the
18 Finnish Court opinion. I certify that the translation is correct.

19 I declare under penalty of perjury and the laws of the United States of America that the foregoing
20 is true and correct.

21 Executed on this day on the 15th day of September, 2025 in Finland.

22
23 /s/ Lauri Valjakka
24 Lauri Valjakka